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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Proposed Rules Authorizing Permissive Use of the "Next Generation" Broadcast Television Standard (GN Docket No. 16-142)

Dear Secretary Dortch:

In response to the Commission's proposed rules¹ and comments already submitted by various stakeholders,² the National Center for Missing & Exploited Children (NCMEC) respectfully submits the following Reply Comments and information in support of efforts to improve all forms of broadcast technology relevant to the AMBER Alert program.

Background and Technology Improvements Affecting AMBER Alerts

The AMBER Alert program is a tool synonymous with the search for abducted children. Following the tragic abduction and murder of Amber Hagerman, in 1996 broadcasters in the Dallas-Fort Worth area partnered with law enforcement to create a system for rapidly notifying the public when another child faces similar life-threatening danger.

The program has now been adopted by all 50 states, the District of Columbia, Indian country, Puerto Rico, the U.S. Virgin Islands as well as serving as a model for many other countries around the world. The U.S. Department of Justice coordinates the AMBER Alert program on a national basis, and NCMEC manages a secondary distribution program to rapidly respond and expand the reach of alert messages through a variety of communications, technology, and social media partnerships. NCMEC has proudly provided more than a decade of this operational support for the AMBER Alert program.

¹ *Authorizing Permissive Use of the "Next Generation" Broadcast Television Standard*, Notice of Proposed Rulemaking, 32 FCC Rcd 1670 (2017) ("NPRM").

² *See, e.g.*, AWARN Alliance Comments, PS Docket No. 15-91(May 9, 2017).

The program is a voluntary partnership between law enforcement agencies, broadcasters, transportation agencies, and the wireless industry, to activate an urgent bulletin using all available technology in the most serious child abduction cases. To date, at least 868 abducted children have been recovered specifically because of messages and broadcasts sent to the public from the AMBER Alert Program.³

NCMEC has also joined colleagues in the non-profit, private, and public sectors for several years to provide insight and suggestions for improving the effectiveness of broadcast technology under the Commission's consideration, including Wireless Emergency Alert (WEA) messages, to strengthen their efforts to find abducted children quickly and safely.⁴ Since the inception of WEA in 2012, NCMEC has broadcast more than 300 WEA messages issued on behalf of AMBER Coordinators and WEA messages specifically have now been credited with the safe return of 40 children. Each of these alerts is issued with a goal to galvanize the entire community to search for children in danger.

Relevance of "Next Generation" Broadcast Television Standard for AMBER Alerts

The petitioners have indicated several possible improvements that the Next Gen TV standard could provide for advanced emergency alerting,⁵ and the Commission has requested comment on asserted benefits like the ability to "tailor information for specific geographic areas, and provide enhanced datacasting to serve law enforcement, first responder, and emergency management organizations more efficiently."⁶

To remain effective, AMBER Alert messages must provide enough descriptive information to assist with efforts to identify and recover the child in danger. NCMEC supports improvements to broadcast technology, like the ATSC 3.0 transmission standard, that allows more meaningful and detailed information to reach the public about a child abduction. Currently, NCMEC applies a variety of technological improvements to carefully target missing child information. NCMEC supports improvements that could assist with better geo-targeting and customization (including language and other forms of accessibility) of AMBER Alert broadcasts. Improved tailoring and geo-targeting can help solicit a rapid public response without over-alerting or causing alert-fatigue.

³ Recent AMBER Alert success stories are highlighted on NCMEC's website at www.missingkids.org/AMBER/success.

⁴ See Comments, *Ex Parte* Notices, Reply and Opposition to Reconsideration, NCMEC, PS Docket 15-91, *Wireless Emergency Alerts*, (May 1, 2015), (Jan. 13, 2016), (Mar. 2, 2016), (May 24, 2016), (July 27, 2016), (Jan. 13, 2017).

⁵ See, Joint Petition for Rulemaking of America's Public Television Stations, the AWARN Alliance, the Consumer Technology Association, and the National Association of Broadcasters, GN Docket No. 16-142 (filed Apr. 13, 2016), and subsequent Comments by Petitioners (May 9, 2017).

⁶ NPRM ¶ 69

The National Center for Missing & Exploited Children is encouraged by these proposals and urges the Commission and all valued partners in the public and private sectors to continue researching and proposing technological advancements that may, in part, help to enhance AMBER Alert messages and protect our nation's children.

Respectfully submitted,

A handwritten signature in dark ink, reading "Michelle C. DeLaune". The signature is written in a cursive, flowing style.

Michelle C. DeLaune
Senior Vice President, Chief Operating Officer
National Center for Missing & Exploited Children